





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III

1650 Arch Street Philadelphia, Pennsylvania 19103-2029

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

American Premier Underwriters, Inc. C/O Benjamin G. Stonelake Blank Rome LLP One Logan Square 130 North 18th Street Philadelphia, PA 19103-6998

Re: Required Submission of Information

Safety Light Corporation Site Bloomsburg, Pennsylvania

Dear Mr. Stonelake:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the Safety Light Corporation Site, which is an active manufacturing facility occupying approximately 2 acres of a 10-acre property adjacent to the Susquehanna River off Old Berwick Road, Bloomsburg, Columbia County, Pennsylvania (hereafter known as the "Site" or "Facility"). This information request addresses all periods of ownership and operation of any of Safety Light's predecessor or affiliated companies including, but not limited to, U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal and Isolite. Safety Light Corporation presently uses tritium in the manufacture of self-illuminated signs. Past disposal practices of various radioactive isotopes at the Site resulted in radiological contamination of on-site soils and groundwater.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), EPA has the authority to require American Premier Underwriters, Inc. (the terms "you," and "Respondent" mean American Premier Underwriters, Inc. and the former Pennsylvania Railroad Company, hereinafter APU) to furnish all information and documents in your possession, custody or control, or in the possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored,

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